

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

DAVID STEBBINS,)	
)	
Plaintiff,)	
)	
v.)	Case No. 10-3305-CV-S-RED
)	
RELIABLE HEAT & AIR, LLC, et al.,)	
And)	
)	
RANDAL RICHARDSON, et al.)	
)	
Defendants.)	

PLAINTIFF'S RESPONSE TO DEFENDANTS'

FIRST REQUEST FOR ADMISSIONS

Enclosed is the Plaintiff's response to the Defendants' first request for admissions.

1. Admit that you did not inform Richardson of your disability prior to starting your employment with Defendants.
Response: Admit that I did not inform Richardson of my disability *prior* to starting employment, but I still timely informed him.
2. Admit that you were offered a different employment with defendants to accommodate your disability as alleged in your complaint.
Response: Deny
3. Admit that you refused to accept a different employment position with Defendants.
Response: Deny
4. Admit that during your employment with Defendants you were rude and verbally abrasive to customers that called Defendants' office.
Response: Deny that I was "rude and abrasive," but admit to the possibility of being tactless.
5. Admit that you were offered an employment with Defendants in a position that did not require customer contact and that you refused to accept such a position.
Response: Deny
6. Admit that you read and signed the standard company policy pamphlet.
Response: Admit that I read and signed the policy pamphlet, but do not agree, blindly, to any specific terms.
7. Admit that Defendants' business a service-oriented business with a reputation for quick, quality and friendly service.
Response: The Plaintiff lacks sufficient information to either admit or deny. The Plaintiff has no knowledge of the company's "reputation" throughout Branson, MO. The Plaintiff cannot reasonably obtain this information with the resources currently at his disposal. In any event, the Plaintiff denies that such a fact is even relevant to this case.



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Comes now Plaintiff David Stebbins, who hereby submits the following request for production:
In his answer to his first interrogatory, Richardson explained that he attempted to accommodate my disability by offering me a job reassignment to a computer station.

Furthermore, I want a copy of Reliable Heat & Air, LLC's bank records, detailing every single bank transaction from the date of January 1, 2009 to December 31, 2009. Along with the actual bank transactions, I also want the names of the other parties to whom these payments were either sent, or received.

David Stebbins

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